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5 Attorneys for Defendant Board of Trustees of the California State University (erroneously sued  
herein as CSU, Bakersfield)  
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8 UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10 LASHAWN BAREFIELD,

11 Plaintiff,

12 v.

13 CALIFORNIA STATE UNIVERSITY,  
BAKERSFIELD, a California Public Entity,  
14 and DOES 1 through 50, inclusive,

15 Defendants.

Case No. 05-cv-00633 AWI TAG

**STIPULATION AND PROTECTIVE  
ORDER**

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17 IT IS HEREBY STIPULATED AND AGREED by and between Defendant BOARD OF  
18 TRUSTEES OF THE CALIFORNIA STATE UNIVERSITY (erroneously sued herein as CSU,  
19 Bakersfield) ("CSU") and Plaintiff LASHAWN BAREFIELD, subject to the approval of the Court,  
20 that the employment applications of persons applying for the position of Director of Student  
21 Activities at California State University, Bakersfield, Position Number 891, the employment  
22 applications of the interim Directors of Student Activities at California State University, Bakersfield,  
23 and the employment applications of persons applying for the position of Director of Student  
24 Activities at California State University, Bakersfield, Position Number 1010, and the documents  
25 relating to the selection and interview process for said positions, contain confidential information,  
26 and therefore the access and use of said documents shall be governed and limited by the provisions  
27 of the following protective order.

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**PROTECTIVE ORDER**

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2       1.     The employment applications of persons applying for the position of Director of  
3 Student Activities at California State University, Bakersfield, Position Number 891, the employment  
4 applications of the interim Directors of Student Activities at California State University, Bakersfield,  
5 and the employment applications of persons applying for the position of Director of Student  
6 Activities at California State University, Bakersfield, Position Number 1010, and the documents  
7 relating to the selection and interview processes, are to be labeled "Confidential". Private  
8 information of the applicants including the applicant's social security number and driver's licence  
9 number shall remain redacted.

10       2.     Persons qualified to view documents labeled "Confidential" are limited to the parties  
11 in this litigation, their counsel and employees of their counsel whom it is necessary that the material  
12 be disclosed for purposes of this litigation, retained and unretained experts and consultants and their  
13 employees whom it is necessary that the material be disclosed for purposes of this litigation,  
14 stenographic reporters at depositions taken in this action, and deponents and their counsel during the  
15 course of any deposition taken in this action.

16       3.     In the event an attorney to this litigation seeks to use any documents deemed  
17 "Confidential", or any portion thereof, or any reference or quote of the documents deemed  
18 "Confidential", in a filing or lodging with the court, or for use at a hearing or trial, such a document  
19 will be filed under seal in sealed envelopes bearing the following statement: "CONFIDENTIAL:  
20 THIS ENVELOPE CONTAINS DOCUMENTS AND INFORMATION FILED SUBJECT TO A  
21 PROTECTIVE ORDER". Documents filed under seal will remain sealed by the court as to all  
22 persons not listed in paragraph two, above. Further, deposition transcripts and other materials which  
23 contain or reference the documents deemed "Confidential" will be marked by the court reporter or  
24 by the parties or their counsel on the cover of the transcripts or in other prominent locations to reflect  
25 this Protective Order.

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4. This Stipulation and Protective Order may be executed in counterparts.

Dated: February 17, 2006

LANG, RICHERT & PATCH, P.C.

By /s/ Charles Trudrung Taylor  
Charles Trudrung Taylor  
Attorneys for Defendant Board of Trustees of the  
California State University (erroneously sued herein  
as CSU, Bakersfield)

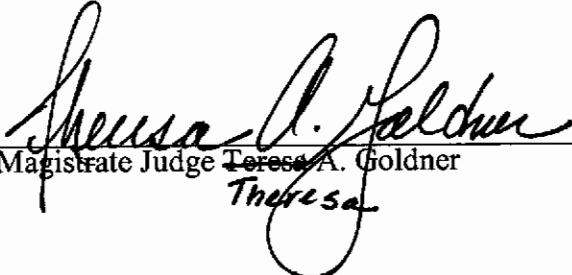
Dated: February 10, 2006

LAW OFFICES OF WAUKEEN Q. MCCOY

By /s/ Waukeen Q. McCoy  
Waukeen Q. McCoy  
Attorneys for Plaintiff Lashawn Barefield

IT IS SO ORDERED.

Dated: February 23, 2006

  
Magistrate Judge Theresa A. Goldner  
*Theresa*